

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

TIMOTHY TYLER,	§	
and	§	
JOSEPH RAMEY	§	
Plaintiffs,	§	
	§	CIVIL ACTION NO. 4:15-cv-03668
v.	§	
	§	
NETWORK CONNECTIONS, INC.,	§	
ET AL	§	
Defendants.	§	

PLAINTIFF’S EXPERT WITNESS DESIGNATION

Plaintiff, Timothy Tyler, hereby designates the following non-retained experts who will not testify at trial but may be called upon to testify regarding attorney’s fees post-trial, in person or by affidavit:

1. Jo Miller, Attorney at Law
Law Office of Jo Miller, PLLC
505 North Main Street
The Parsonage
Conroe, Texas 77301
Tel: (936) 539-4400
Fax: (936) 539-4409
jmiller@jomillerlaw.com

Ms. Miller is licensed to practice before this court and practices primarily in the area of employment and family law. Ms. Miller will testify by about the reasonableness and necessity of Plaintiff’s attorney’s fees, expenses and costs. If attorney’s fees are awarded to Plaintiff, Ms. Miller will render a professional opinion as to the reasonableness, necessity and prevailing rates of the fees and costs incurred by Plaintiff using the “Johnson Factors,” as applicable to this cases. Ms. Miller’s current *curriculum vita* is attached as Exhibit A. No report is available or determinable at this time.

2. Thomas H. Padgett, Jr.
Ross Law Group
4809 Pine St.
Bellaire, Texas 77401
Tel: (832) 335-9134
tpadgett@rosslawgroup.com

Mr. Padgett is licensed to practice before this court and practices primarily in the area of labor and employment law. Mr. Padgett will testify by about the reasonableness and necessity of Plaintiff's attorney's fees, expenses and costs. If attorney's fees are awarded to Plaintiff, Mr. Padgett will render a professional opinion as to the reasonableness, necessity and prevailing rates of the fees and costs incurred by Plaintiff using the "Johnson Factors," as applicable to this cases. Mr. Padgett's current *curriculum vita* is attached as Exhibit B. No report is available or determinable at this time.

Plaintiff reserves the right to call any expert witness designated or called to testify at trial by Defendant. Plaintiff also reserves the right to call any rebuttal or impeaching witnesses, the necessity of whom cannot be reasonable anticipated at this time.

Respectfully submitted,

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By: /s/ Jo Miller

Jo Miller
State Bar No. 00791268
Federal ID No. 20385
Attorney-in-Charge for Plaintiff,
Timothy Tyler

NOTICE OF ELECTRONIC FILING

I, Jo Miller, do hereby certify that I have electronically submitted for filing, a true and correct copy of the above and foregoing document in accordance with the Electronic Case Files System of the Southern District of Texas, on this the 5th day of October, 2016.

/s/ Jo Miller

Jo Miller

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically served on Defendant's counsel of record, Ben Escobar at Akerman.

/s/ Jo Miller

Jo Miller

Attorney-in-Charge for Plaintiff,
Timothy Tyler